

EXHIBIT B

AFFIDAVIT OF J. [REDACTED]

After being duly sworn, [REDACTED] deposes and says as follows:

1. I made this affidavit based on personal knowledge.
2. If I am sworn as a witness, I can testify competently to the facts stated in this affidavit.
3. I was selected as one of the jurors in Case No. 15-cr-20652 in the United States District Court for the Eastern District of Michigan before the Honorable George C. Steeh.
4. There were some events that impacted upon the jury's deliberations that seemed inappropriate or defective.
5. One of the first things that occurred was after a couple of days of intense deliberations there were jurors who were determined to find the Defendants not guilty, based upon the evidence; the others were equally determined that the Defendants were guilty.
6. In short, we had reached an impasse and informed the Court of the same.
7. When we were brought back into the courtroom, we were told that we had to go back to deliberate and reach an unanimous verdict, either guilty or not guilty, and we were all left with the impression that staying "hung" was not an option.
8. After a few more days of deliberations, no one else changed their mind so the jurors who were in favor of not guilty changed their votes to guilty believing that there was no other way.
9. There was another juror who was called "[REDACTED]" who said she lived adjacent to the red zone and was familiar with that area.
10. She talked from personal experience about how these types of guys, meaning the Defen-

dants, were ruining the neighborhood.

11. When it was pointed out that we had to decide the case based on the evidence that was presented, [REDACTED] reminded everybody that she lived in the area as opposed to the suburban-ites who did not understand Detroit neighborhoods.
12. In one instance, we were talking about the evidence and the 007 strip club came up, and [REDACTED] stated that she knew for a "fact" where it was located, and I thought she was wrong, and I do not believe it was ever presented in evidence where it was located.
13. It seemed like [REDACTED] had a personal interest in this case because she lived in a nearby neighborhood.
14. [REDACTED] told us she had seen Seven Mile Blood graffiti on buildings around her neighborhood.
15. She was able to influence the other jurors regarding facts or information that was not put into evidence.
16. At one point the deliberations became very heated and voices were raised and a Marshal came into the jury room and told us to tone it down because our voices could be heard outside the jury room. This Marshal was caucasian, tall, thin, and he might have had some facial hair.
17. Since I was not engaged in loud discussions, the Marshal coming into the jury room to tell us to quiet down had little impact upon me; I cannot say how it affected other jurors, but I noticed the next day that [REDACTED] was quieter.
18. No one asked for the Marshal's assistance; he either came in on his own or someone else told him to come into the jury room.

Under the penalties of perjury, the foregoing information is true to the best of my information, knowledge, and belief, except as to those matters stated to be based on information and belief, and as to those matters, I believe the same to be true.

12/15/18
Date

[Redacted Signature]
[Redacted Name]

Subscribed and sworn to under oath by [Redacted Name] before
me on December 15, 2018 (date).

Notary Public: Desiree Edwards (sign)
Desiree Edwards (print)

County of Commission: Wayne
Acting in the County of Macomb
My commission expires on 3/16/2022